



Delia A. Isvoranu
DIsvoranu@filicebrown.com

March 21, 2008

The Honorable William H. Alsup
United States District Court
Northern District of California
450 Golden Gate Avenue, 16th Floor
San Francisco, CA 94101

Re: *Samuel B. Johnson III v. Chevron Corporation, et al.*
Northern District of California Case No. CV07-5756

Dear Judge Alsup:

We are in receipt of Plaintiff Samuel Johnson's March 17, 2008, letter to the Court. While we are hesitant to burden this Court with correspondence of this nature, we take Mr. Johnson's letter and unfounded accusations very seriously and feel compelled to respond.

Not only has there been no "grave abuse of the discovery rules" by Defendant Chevron ("Chevron"), but in fact, there has been no "abuse" whatsoever. Chevron has **not** conducted **any** discovery in this action. As Mr. Johnson is well aware, no written discovery has been served upon him, no depositions have been noticed and no subpoenas have been issued, making his bold claims to the contrary inappropriate. Indeed, while Mr. Johnson has routinely contacted Chevron's attorneys both by telephone and in written correspondence, he never once raised or discussed this ill-perceived issue with them, reserving it instead for his inflammatory correspondence to this Court.

Mr. Johnson cannot preclude Chevron from conducting informal investigation in this matter (rather than "discovery"), particularly given the delay caused by Mr. Johnson's insistence, more than two months ago, that this action be stayed while he obtains an appointment of counsel. To date, he has not done so. Rather, he has used this indefinite stay to his benefit, by devoting his time instead to *himself* conducting discovery against Chevron, obtaining information and documents in relation to the claims asserted in his simultaneously pending Workers' Compensation action. Yet, ironically, he would seek to preclude Chevron from conducting even *informal* investigation in support of its defenses.

LAKE MERRITT PLAZA ♦ 1999 HARRISON STREET ♦ SUITE 1800
PO BOX 70850 ♦ OAKLAND, CA 94612-0850 ♦ 510.444.3131 FAX: 510.839.7940

ONE CALIFORNIA PLAZA ♦ 300 SO. GRAND AVENUE ♦ SUITE 1400
LOS ANGELES, CA 90071-3124 ♦ 213.687.2666 FAX: 213.687.2660

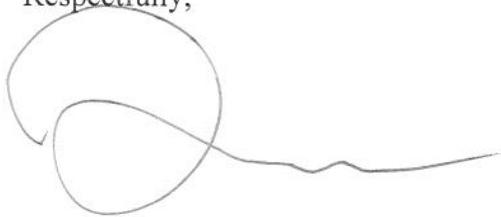
Re: *Samuel B. Johnson III v. Chevron Corporation, et al.*

Page 2

FBE&M

We hope we have addressed this issue to the Court's satisfaction and that any unwarranted inference that Chevron has acted inappropriately is now dispelled.

Respectfully,

A handwritten signature consisting of two overlapping circles and a wavy line extending from the bottom right.

Delia A. Isvoranu